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PROPOSED COUNSEL FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	
NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC,	§	CASE NO. 21-30085-hdh11
	§	
DEBTORS¹	§	Jointly Administered

MOTION FOR EXPEDITED CONSIDERATION

The National Rifle Association of America and Sea Girt LLC (collectively, the “Debtors”) file this motion to request expedited consideration of *Debtors’ Motion for Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business* [Docket No. 90] (the “Ordinary Course Professional Motion”).

Neligan LLP’s *Application for an Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtors* (“Neligan’s Application”) [Docket No. 82] was filed on Friday, January 19, 2021, and has been set for February 24, 2021 at 2:00 p.m. (CST), a scheduled

¹ The last four digits of the Debtors’ taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors’ mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

day for hearings in this case. The Ordinary Course Professional Motion was not ready to be filed last Friday. However, the Motion was filed today, which is still 23 days from the February 24, 2021 hearing date. Therefore, the Debtors request that the Court permit Debtors to set the Ordinary Course Professional Motion for hearing on **February 24, 2021 at 2:00 p.m. (CST)**, along with Neligan's Application, so that the matters can be heard together.

Dated: February 1, 2021

Respectfully submitted,

/s/ Patrick J. Neligan, Jr.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 1st day of February 2021 a true and correct copy of the foregoing was served via first class U.S. mail on the parties named on the attached Master Service List.

/s/ Douglas J. Buncher

Douglas J. Buncher

In re: Sea Girt LLC - Case No. 21-30080
In re: National Rifle Association of America - Case No. 21-30085

MASTER SERVICE LIST

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U.S. Trustee

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Secured Creditors

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20 Largest Unsecured Creditors

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